

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Review of Part 15 and other Parts of the	)	ET Docket 01-278
Commission's Rules	)	RM-9375
	)	RM-10051

**Reply Comments of Interlogix, Inc.**

Interlogix, Inc. ("Interlogix"), by its attorneys, hereby files these reply comments in the above-captioned proceeding.<sup>1</sup> Interlogix is a leading manufacturer of wireless electronic security products regulated under Part 15 of the Commission's rules and will be directly affected by the outcome of this proceeding.

Interlogix is a global technology leader, supporting the needs of the rapidly growing electronic security industry. Through its Security and Lifesafety Group, Interlogix develops and manufactures intrusion and fire protection systems for home, commercial and industrial markets. Products include, motion detectors, control panels, cameras, keypads, vibration sensors, smoke and carbon monoxide detectors – the full range of equipment required to safeguard premises of all types. Interlogix offers this brief response to comments in this proceeding.

Data Transmissions under Section 15.231(a)

Interlogix is pleased to note the universal agreement with the Commission's proposal to remove the restriction on the transmission of data in Section 15.231(a) of the rules. Whatever minor variations in the rules that have been proposed, it is important that

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<sup>1</sup> Interlogix previously filed Comments in this proceeding generally agreeing with the proposals recommended by the Commission.

the Commission recognize that its proposal to permit data transmissions is an idea whose time has come. Hopefully, the Commission will be able to effect this change as quickly as possible in order to permit Interlogix and others to design and offer new products that will be attractive to the public.

#### Receivers Operating Above 960 MHz.

Some commenters questioned whether the record establishes that police radar receivers do, in fact, cause interference to VSAT systems, while others assumed such interference as an established fact. Interlogix takes no position with respect to whether interference occurs, but certainly agrees with those who argue that if there are out-of-band emissions standards for receivers above 960 MHz, they should apply only to police radar detectors.

While the evidence of interference from police radar detectors may be anecdotal, there is no evidence at all of interference from any other type of receiver. Yet two commenters have suggested that the Commission adopt out-of-band standards for all receivers operating above 960 MHz. Cisco has made such a proposal without explanation. Uniden has argued that out-of-band standards might apply to all receivers operating above 960 MHz on the theory that it is difficult to tell where interference is coming from. Interlogix can only note that the entire issue of interference has been raised by VSAT operators who claim to know very well that their systems receive interference from police radar detectors and not other receivers. And, indeed, there is some science to support their claims. The oscillators of police radar detectors sweep across the VSAT band. The oscillator frequencies of RCR devices manufactured by Interlogix are far removed from the VSAT band and there has been no suggestion that their emissions are of concern. Interlogix again urges the Commission not to use a broad-brush approach to new regulations, if any. The unintended consequences of over-regulation could be disastrous to other, non-offending products.

## Protection of the Digital Audio Radio Service.

As others surely must be, Interlogix is shocked at the comments of the two DARS licensees, Sirius Satellite Radio, Inc. (“Sirius”) and XM Radio Inc. (“XM”). In a naked attempt to increase the value of their spectrum holdings, Sirius and XM have inappropriately chosen this Docket to request an unparalleled level of protection from Part 15 and Part 18 devices. It is unfortunate that it is necessary to respond to a “comment” that has little to do with any proposal or question put forth in this proceeding. Nevertheless, it would be more unfortunate were the Commission to believe there to be no objection to the preposterous proposals of the DARS licensees, and so Interlogix must hereby formally object.<sup>2</sup>

Sirius and XM want nothing more than complete silence in their band. They wish to ensure that Part 15 and Part 18 devices, properly engineered, and otherwise good spectrum neighbors, are nevertheless restricted to a field strength of 8.6  $\mu\text{V/m}$  at 3m (18.7dB $\mu\text{V/m}$ ) in the 2320-2345MHz DARS band.<sup>3</sup> This limit is more than 98% below the present limits (i.e. less than 1000<sup>th</sup> the power) permitted for intentional radiators that place emissions in the DARS band.

As the Commission must surely realize, there are many tens of millions of Part 15 devices that could well place some harmonic emission in the DARS band above the limit requested by the DARS licensees. The effort required to modify these devices to meet the requested limit – assuming that is at all possible – would cost many millions of dollars and render continued sale of many devices entirely impractical. It is simply not the case as argued by XM that there are technological “fixes” available at “minimal cost.”

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<sup>2</sup> Assuming the requests of the DARS licensees should be considered at all, this proceeding is certainly not the proper forum. It is noted that Sirius and XM have filed a Petition for Rulemaking seeking similar protection. That Petition, wisely, has yet to be placed on public notice.

<sup>3</sup> XM would permit a limit of 18  $\mu\text{V/m}$  for devices operating exclusively inside vehicles.

In many cases it is impossible to re-design a device that has been marketed successfully for years, much less design an entirely new device.

Interlogix alone has sold more than 20 million transmitters which can be expected to operate for many years. The DARS licensees, in a fit of reality, have chosen not to attack this imbedded base. Somehow, they have determined that they can live with all these transmitters, and are seeking protection only from transmitters manufactured 18 months after adoption of a rule. For this incremental benefit of lower emissions from future transmitters, the DARS licensees request the Commission to adopt a rule that could harm entire industries. This makes little sense and is not in the public interest.

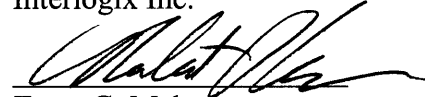
Everyone knows that operation of a Part 15 device is conditioned on not causing interference to the licensed services. Manufacturers of Part 15 devices must, therefore, design their products accordingly. But no sane manufacturer could possibly contemplate that the Commission might permit the operation of a licensed consumer service requiring 98% greater protection than had ever been contemplated. Of course, it is difficult to imagine that anyone might invest in a new service requiring such a level of protection. Yet, according to the DARS licensees, that is exactly what they did. XM disingenuously describes its system as “somewhat more susceptible to out-of-band interference from unlicensed devices than other licensees.” The DARS systems are more than “somewhat” susceptible to interference if they require security systems and other Part 15 devices to be redesigned so that their spurious emissions are 98% less than permitted at present.

The real agenda here is simple. The DARS licensees bid a lot of money and then designed a system that can only work properly if all others have been silenced. The DARS systems are exactly what the DARS licensees chose to build. Their susceptibility to interference is exactly what the DARS licensees should have contemplated. To grant the level of protection requested would, quite simply, have the

effect of destroying the security and alarm industry or any other business that did not anticipate that someone would design a consumer service requiring more protection than the ultra sensitive radio receivers searching for signs of intelligent life in the universe. Interlogix is confident that the Commission will not permit this to happen.

Respectfully submitted,

Interlogix Inc.

A handwritten signature in black ink, appearing to read "Terry G. Mahn", is written over a horizontal line.

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